

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

NO. 3:23-CR-27

v.

ASIANA CHRISTINE WILLIAMS

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FILED  
SCRANTON

MAR 22 2024

PER

  
DEPUTY CLERK

MOTION FOR LEAVE TO OBTAIN  
GRAND JURY TRANSCRIPTS

COMES NOW, Your defendant, Asiana Williams respectfully moving this honorable court for an order directing the grand jury transcripts be produced to defendant.

In support your defendant offers the following:

## **I. INTRODUCTION**

This case begins with a drug transaction where defendant is alleged to have sold fentanyl that became the cause of a later death. Did prosecutors tell the grand jury that Ceri got high twice off the drugs that she purchased at the hospital and Troy did 5 bags and went back to work. Troy texted Ceri within 20 minutes of getting high to ask her if she wanted to go to Philly to buy some more drugs? Did the prosecutors tell the grand jury that there was a 2<sup>nd</sup> drug dealer who had fentanyl, crack, and heroin? Did the government tell the grand jury that dying on the toilet is usually associated with Speed Balling? Ceri only bought fentanyl at the hospital, where did the other drugs come from? The government claims that it was the sole causation of the defendant Sale that ended in the death of the deceased.

## **II. RULE OF LAW**

The supreme court in *Dennis versus United States*, 384 U.S. 855 (1966). First endeavored to address the question whether defendants in federal cases could have access to grand jury minutes. In this case the court appended that the requisite for disclosure was that the defendant must demonstrate “particularized need.”

The phrase “particularized need” first appeared in United States versus Procter and Gamble company, 356 US 677, 683-1958 disclosure may be permitted by the court at the request of the defendant upon a showing that grounds me exists for a motion to dismiss the indictment because of matters occurring before the grand jury.

### **III. APPLICATION**

Applying the above cited principles of law to the instant case should resolve to support the defendants request for production of grand jury minutes as it is consistent with the Supreme Court’s long-standing directive that defendant be entitled to inspection of grand jury minutes especially whereas here they seek to move the court to dismiss the indictment.

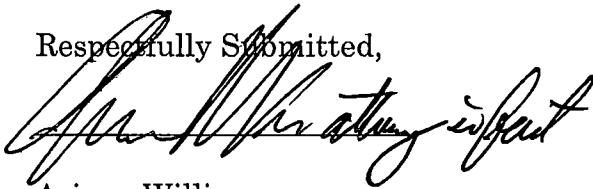
### **IV. CONCLUSION**

In conclusion, some cases brought before the court are not so clear as to why relief should be granted, however in this case, there is a Death by Delivery indictment that just doesn’t qualify. The facts in this case does not support a death by delivery charge.

**WHEREFORE** your defendant humbly asks the court to grant the requested relief so as to allow the defendant to further show this court that not only does the facts not support the charges, in fact, this case should be dismissed.

Done this 25<sup>th</sup> day of February 2024.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Asiana Williams", written over a horizontal line.

Asiana Williams

**TO BE ADOPTED BY COUNSEL**

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